IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

JANE DOE	

Plaintiff,

v.

Case No. 1:11 CV 1105

LINDA HOWARD RUSSELL HOWARD

Defendants.

MOTION FOR LEAVE TO AMEND EXHIBIT LIST

On June 20, 2012, Plaintiff Jane Doe submitted a list of exhibits she expected to present at trial (Docket No. 100). Plaintiff hereby respectfully requests leave to amend this list of exhibits to include the Expert Report of Florence R. Burke.

Ms. Burke wrote this Report after conducting an extensive interview with Plaintiff. In it, she opines on both the immediate and long-term impact that Defendants' mistreatment had on Mrs. Doe. An Amended Exhibit List is attached as Exhibit 1.

Defendants will not be prejudiced by this amendment, as Plaintiff served Defendants with the Expert Report of Florence R. Burke on May 4, 2012.

Respectfully submitted,

Dated: August 3, 2012 By: /s/ Daniel E. Chudd

Daniel E. Chudd (VA Bar No. 65335) Sarah A. Maguire (VA Bar No. 71232) Lorelie S. Masters (*Pro Hac Vice*) Leah J. Tulin (*Pro Hac Vice*) Maya D. Song (*Pro Hac Vice*) Chavi Keeney Nana (*Pro Hac Vice*)

JENNER & BLOCK LLP 1099 New York Ave., N.W., Suite 900 Washington, DC 20001 Phone: 202-639-6000

Counsel for Plaintiff Jane Doe

Fax: 202-639-6066

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2012, a true and correct copy of the foregoing Motion to Amend Exhibit List was electronically filed. As such, this notice was served on all parties who are deemed to have consented to electronic service. On August 3, 2012, I also caused to be served by electronic mail and by U.S. Mail, a copy of the Motion to Amend Exhibit List upon the following:

LINDA HOWARD 1028 Walter Reed Dr. Apt. 634 Arlington, VA 22204 lhowardhawk@yahoo.com

RUSSELL HOWARD 1028 Walter Reed Dr. Apt. 634 Arlington, VA 22204 russlindy@gmail.com

/s/ Daniel E. Chudd

DANIEL E. CHUDD (VA Bar No. 65335)

Attorney for Plaintiff Jane Doe